

FILED

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FEB 23 2022

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH EUGENE SUERO-OLMEDA,

Defendant.

**4:22CR00109 JAR/DDN**

**INDICTMENT**

The Grand Jury charges:

**COUNT ONE**

**(Unauthorized Use of Access Device)**

From on or about October 1, 2021, and continuing through on or about October 3, 2021, in the Eastern District of Missouri, the defendant,

**JOSEPH EUGENE SUERO-OLMEDA,**

did knowingly and with intent to defraud, used one or more unauthorized access devices, to wit, a Discover credit card belonging to "M.H.," during a one-year period, and by such conduct did obtain something of value aggregating \$1,000.00 or more during that period, said conduct affecting interstate and foreign commerce.

In violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

**COUNT TWO**

**(Aggravated Identity Theft)**

On or about October 1, 2021, and continuing through on or about October 3, 2021, in the Eastern District of Missouri, the defendant,

**JOSEPH EUGENE SUERO-OLMEDA,**

during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), specifically, Title 18 United States Code Section 1029(a)(2) (access device fraud), did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: the Discover account number ending in 1937, belonging to "M.H.," knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

**COUNT THREE**

**(Aggravated Identity Theft)**

On or about October 1, 2021, and continuing through on or about October 3, 2021, in the Eastern District of Missouri, the defendant,

**JOSEPH EUGENE SUERO-OLMEDA,**

during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), specifically, Title 18 United States Code Section 1029(a)(2) (access device fraud), did knowingly possess and use, without lawful authority, a means of identification of another person, to wit: the Visa account number ending in 0389, belonging to "E.W.," knowing that the means of identification belonged to another actual person.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING  
United States Attorney

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JENNIFER J. ROY #47203MO  
Assistant United States Attorney